

CHAPTER 3 PROJECT EXECUTION

3-1. Introduction.

a. This chapter discusses project requirements for USACE elements involved in RCWM response projects. Several RCWM project requirements are identical to the requirements for OE projects. These requirements include: business management practices; project prioritization; the project team approach; project management plans; scheduling; project funding; project reporting requirements; contracting; estimating; and real estate activities.

b. Project Management for RCWM projects will be implemented in accordance with ER 5-1-11.

3-2. Property Management. As a general policy, contractors are normally required to furnish all equipment and materials necessary to perform their contract tasks. However, when deemed to be in the best interest of the government, equipment/materials (e.g., vehicles, engineering controls, explosives, magnetometers, etc.) may be provided to the contractor by the government.

a. There is some Government Furnished Property (GFP) available for use on RCWM project sites. This equipment has been used on past RCWM project sites and has been contaminated with RCWM agent. It has been properly decontaminated and the agent is no longer detectable at the action levels. This category of equipment will remain under Government control. This equipment can be used on future RCWM project sites by government contractors with the proper procedures in place. The intent of using these pieces of equipment in lieu of buying or leasing new equipment is financial efficiency. If any of this category of GFP is necessary on the RCWM project site, coordination will be accomplished between USAESCH, the contractor, and the supporting agency.

b. If GFP is not provided but the contract requires specialized equipment or materials that are not included in the contractor's overhead rate, procurement or lease may be authorized. In all cases, property management will comply with the Federal Acquisition Regulation (FAR), other applicable DOD and DA policies, and with the internal policies of the district or USAESCH OE Design Center, as appropriate.

c. Additional information on project management is provided in EP 1110-1-18. Topics discussed include: GFP provided to the contractor, acquisition planning, acquisitions, property management plan, and contract surveillance.

3-3. Quality Assurance. Quality assurance requirements for RCWM response projects include project QA and programmatic QA. These requirements are discussed in EP 1110-1-18. Quality planning, government QA and contractor quality control (QC) are also discussed in EP 1110-1-18.

3-4. Public Participation. Public participation is an integral component of the RCWM response process. The USACE is committed to providing public participation activities during RCWM response projects. The requirements for public participation during a RCWM response project are discussed in EP 1110-3-8.

3-5. Environmental Considerations.

a. The district, in consultation with their OC and the OC supporting the OE MCX, as required, is the lead USACE agency on environmental issues related to RCWM response actions and is responsible for coordinating with regulators on these issues. Environmental issues will be addressed in project work plans prior to fieldwork.

b. RCWM response actions must be conducted consistent with CERCLA and the NCP. There are some unique federal requirements that may apply to RCWM actions, as well as some state considerations. The district must ensure that it has evaluated the applicable requirements and addressed those that are specific to that particular site. The impact of these regulations will not be the same at each site due to differences in site geography and differences among state/local regulations, for example. Vigilance must be constantly exercised to ensure that applicable changes in Federal, state, or local regulations are addressed. Additional information on Federal statutes and regulations, state laws and regulations, and local regulations is presented in EP 1110-1-18.

(4) Other Environmental Laws for RCWM Response Actions. Table 3.1 presents a summary of DOD directives, instructions, and regulations relevant to the environmental aspects of RCWM response actions. This table may be used as a checklist in determining the applicable environmental laws for a specific project. EP 1110-1-18 presents additional tables of other environmental laws that may be applicable to RCWM response actions, and additional environmental laws and regulations that may be applicable at specific RCWM contaminated sites.

3-6. Geophysical Considerations. Detailed procedures for geophysical considerations for RCWM projects are provided in EM 1110-1-4009.

Table 3.1
Department of Defense Directives, Instructions and Regulations for RCWM Response Actions

Directive/Regulation	Title	Contents/Regulations	Applicable (Y/N)
29 CFR 1910	Labor	Describes labor specific requirements for working on potentially contaminated sites that may involve employee exposure or the reasonable possibility for employee exposure to safety or health hazards.	
29 CFR 1926	Construction	Describes Safety and Health regulations for Construction activities	
AR 50-6	Chemical Surety	Prescribes policies, procedures and responsibilities for the Army Chemical Surety Program. Chapter 10, Recovered Chemical Warfare Materiel and Chapter 4, Chemical Accident or Incident Response and Assistance/Event Reporting, apply to RCWM sites. The rest of the chapters discuss chemical surety requirements which do not apply to non-stockpile RCWM sites.	
AR 200-1	Environmental Protection and Enhancement	Prescribes Army policies, responsibilities, and procedures to protect and preserve the quality of the environment.	

Table 3.1 (continued)
Department of Defense Directives, Instructions and Regulations for RCWM Response Actions

Directive/Regulation	Title	Contents/Regulations	Applicable (Y/N)
AR 200-2	Environmental Effects of Army Actions	Contains Army procedures for implementing "National Environmental Policy Act" (NEPA).	
AR 385-10	Army Safety Program	This regulation provides DA policy, responsibilities, and procedures to protect and preserve personnel and property against accidental loss. It provides for public safety incident to Army operations and activities. This regulation assures statutory and regulatory compliance. This regulation also provides the risk assessment model for use on OE project sites.	
AR 385-61	The Army Chemical Agent Safety Program	Provides policy on the management of the chemical agent safety program. It provides procedures for requesting waivers and exemptions to these standards.	
AR 385-64	US Army Explosives Safety Program	Provides protection guidance for sites involving OE. It sets explosives safety standards to protect the public, the workforce and the environment. It is to be used with DA Pam 385-64.	

Table 3.1 (continued)
Department of Defense Directives, Instructions and Regulations for RCWM Response Actions

Directive/Regulation	Title	Contents/Regulations	Applicable (Y/N)
CESO-E Memorandum	SUBJECT: Applicability of Biological Warfare Materiel and Non-Stockpile Chemical Warfare Materiel Response Activity Interim Guidance	This Memorandum directs the implementation of the DACS-SF Memorandum at all USACE activities.	
DA Pam 40-173	Occupational Health Guidelines for the Evaluation and Control of Occupational Exposure to Mustard Agents H, HD, and HT	Explains medical occupational policies and provides procedures pertinent to mustard agents H, HD and HT. The medical policies and procedures are prescribed in AR 50-6.	
DA Pam 40-8	Occupational Health Guidelines for the Evaluation and Control of Occupational Exposure to Nerve Agents GA, GB, GD, and VX	Explains medical occupational policies and procedures pertinent to nerve agents GA, GB, GD and VX. The medical policies and procedures have been aligned with AR 50-6.	

Table 3.1 (continued)
Department of Defense Directives, Instructions and Regulations for RCWM Response Actions

Directive/Regulation	Title	Contents/Regulations	Applicable (Y/N)
DA Pam 50-6	Chemical Accident or Incident Response and Assistance Operations	Explains the policies and procedures prescribed for CAIRA operations in AR 50-6. Chapter 6 discusses the medical support requirements on RCWM sites, Chapter 11 discusses environmental monitoring, and Chapter 17 discusses training requirements (e.g., table top exercises and pre-operational surveys).	
DA Pam 385-61	Toxic Chemical Agent Safety Standards	Establishes the Army safety program for all aspects of military toxic chemical agents. Provides guidance on management of the toxic chemical agent safety program, as well as specific toxic chemical agent safety technical requirements.	
DA Pam 385-64	Ammunition and Explosives Safety Standards	The purpose of pamphlet explains the Army's safety criteria and standards for operations involving ammunition and explosives prescribed by AR 385-64.	

Table 3.1 (continued)
Department of Defense Directives, Instructions and Regulations for RCWM Response Actions

Directive/Regulation	Title	Contents/Regulations	Applicable (Y/N)
DA, Office of the Assistant Secretary Installations Logistics and Environment Memorandum *	SUBJECT: Interim Guidance for Biological Warfare Materiel and Non-Stockpile Chemical Warfare Materiel Response Activities, 5 Sep 1997	The purpose of this Interim Guidance is to ensure the protection of workers, the public, and the environment during RCWM response activities and ensure that these response activities are conducted in accordance with safety and environmental laws and requirements. It defines RCWM, risk assessments, characterization, recovery and packaging, and Safety Submissions.	
DACS-SF Memorandum*	SUBJECT: Approval of Safety Submissions for Non-Stockpile Chemical Warfare Materiel Response Activities, 29 Feb 2000	This document outlines procedures for the coordination, review and approval of RCWM Safety Submissions and changes to RCWM Safety Submissions.	

* these memoranda can be located at <http://www.dac.army.mil/ES/default.asp?id=17>

Table 3.1 (continued)
Department of Defense Directives, Instructions and Regulations for RCWM Response Actions

Directive/Regulation	Title	Contents/Regulations	Applicable (Y/N)
DACS-SF Memorandum*	SUBJECT: Applicability of Biological Warfare Materiel and Non-Stockpile Chemical Warfare Materiel Response Activity Interim Guidance, 19 Mar 1998	This Memorandum assists local commanders, installation commanders, and district commanders in determining if in the Interim Guidance is to be followed on project sites where construction, or environmental response actions other than a RCWM investigation or removal project is conducted at a site with a history of RCWM.	
DOD 6055.9-STD	Ammunition and Explosives Safety Standards	Primary DOD regulation that requires unexploded ordnance cleanup of DOD lands prior to transfer.	
DOD Directive 1000.3	Safety and Occupational Health Policy for the Department of Defense	Establishes the basis for all DOD safety, fire protection, and occupational health programs	
DOD Directive 4165.60	Solid Waste Management-Collection, Disposal, Resource Recovery and Recycling Program	Sets DOD policy and procedures for the DOD comprehensive program of solid waste collection, disposal, material recovery, and recycling in accordance with USEPA guidelines, NEPA, and RCRA.	

* Memorandum can be located at <http://www.dac.army.mil/ES/default.asp?id=17>

Table 3.1 (continued)
Department of Defense Directives, Instructions and Regulations for RCWM Response Actions

Directive/Regulation	Title	Contents/Regulations	Applicable (Y/N)
DOD Directive 4500.9	Transportation and Traffic Management	Describes general DOD transportation and traffic management policies.	
DOD Directive 4700.4	Natural Resource Management Program	Sets DOD policy for management and protection of natural resources.	
DOD Directive 4710.1	Archeological and Historical Resources Management Program	Establishes DOD policies and procedures for protection and management of archeological and historical resources.	
DOD Directive 5100.50	Protection and Enhancement of Environmental Quality	Assigns responsibilities and establishes policies and procedures for protection and enhancement of environmental quality in consonance with federal policy and other DOD issuances.	
DOD Directive 6050.1	Environmental Effects in the United States of DOD Actions	Implements Council on Environmental Quality regulations and provides policy and procedures to enable DOD officials to take into account environmental considerations when considering the authorization or approval of major DOD actions in the United States.	
EM 385-1-1	Safety and Health Requirements Manual	This manual prescribes the safety and health requirements for all Corps of Engineers activities and operations.	

Table 3.1 (continued)
Department of Defense Directives, Instructions and Regulations for RCWM Response Actions

Directive/Regulation	Title	Contents/Regulations	Applicable (Y/N)
EP 1110-1-18	Ordnance and Explosives Response	Provides procedures for the management and execution of OE response actions.	
ER 1110-1-8153	Ordnance and Explosives Response	Establishes roles and responsibilities for USACE elements in managing and executing OE response actions and authorizes and provides for the delegation of such roles and responsibilities.	
ER 385-1-92	Safety and Health Requirements for Hazardous, Toxic, and Radioactive Waste (HTRW) Activities	Identifies the safety and occupational health documents and procedures required to be developed and implemented by USACE elements and their contractors responsible for executing HTRW activities.	
ER 385-1-95 (DRAFT)	Safety and Health Requirements for Ordnance and Explosive Response Actions	Identifies safety and health requirements, responsibilities, and procedures for response actions.	

3-7. Location Surveying and Mapping. An overview of location survey and mapping considerations for OE response projects is provided in EM 1110-1-4009. Detailed survey, mapping, and GIS requirements may be found on the OE MCX website at <http://www.hnd.usace.army.mil/ow>.

3-8. Geographic Information Systems (GIS). The GIS assembles all the data required to associate the non-intrusive subsurface geophysics investigative data to the correct geographical location, the relational database, mapping, and remote sensing data. It provides a standard methodology to assist in the assembly of all past, current, and proposed OE project information into a common reference for analysis, management and storage in a digital format for the project's administrative record.

3-9. Innovative Technologies in RCWM Response Actions.

a. Innovative technologies, like any other engineering tool, must be applied appropriately to a RCWM response project. The best available technology for each RCWM response project may vary due to differing, as well as highly unpredictable, site conditions.

b. The OE MCX has been charged with reviewing, evaluating, and approving the implementation of the best available OE detection and removal technologies for OE response projects. The OE MCX ensures that the implementation of innovative technologies is efficient and effective. The OE MCX defines current technology and functional requirements, provides consulting services to projects, identifies technology gaps, provides seed money to field improved technologies, and supports other technology programs. To assist with these functions, the OE MCX maintains an OE Innovative Technology Program.

c. Additional information on the Innovative Technology Program and the Innovative Technology Advocate is provided in EP 1110-1-18.